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HFR MA Strategic Master Trust,
Institutional Benchmarks Series (Master Feeder)
Ltd., Lyxor/Paulson International Fund Limited,
Paulson Enhanced Ltd., Paulson International
Ltd., Paulson Partners Enhanced, L.P., and
Paulson Partners L.P.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	Bankruptcy Case No.: 09-50026 (REG)
f/k/a General Motors Corporation, <i>et al.</i> ,)	(Jointly Administered)
)	
Debtors.)	
)	

**NOTICE OF APPEARANCE AND DEMAND
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby enters its appearance as counsel to (1) dbX – Risk Arbitrage 1 Fund, (2) HFR MA Strategic Master Trust, (3) Institutional Benchmarks Series (Master Feeder) Ltd., (4) Lyxor/Paulson International Fund Limited, (5) Paulson Enhanced Ltd., (6) Paulson International Ltd., (7) Paulson Partners Enhanced, L.P., and (8) Paulson Partners L.P., which are investment funds or accounts managed by Paulson & Co. Inc. (collectively, the “Paulson Noteholders”), in the above-captioned chapter 11 bankruptcy cases (collectively, the “Cases”), and that this request is made pursuant to Section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010 of the

Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and that all notices, including those governed by Bankruptcy Rules 2002, 3017 and 9007, given and all papers served or required to be served in the Cases, or in any case, controversy or proceeding related to the Cases, be given to and served upon:

1. Steven J. Reisman, Esq.
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- and -
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PLEASE TAKE FURTHER NOTICE that the Paulson Noteholders own certain 8.875 percent notes due July 10, 2023 (“8.875 Notes”) and 8.375 percent notes due December 7, 2015 (“8.375 Notes”, together with 8.875 Notes, the “Nova Scotia Notes”), issued by General Motors Nova Scotia Finance Company, and guaranteed by Motors Liquidation Company f/k/a General Motors Corporation, a debtor in the Cases, as follows:

<u>Fund / Account</u>	<u>Nova Scotia Notes</u>
1. dbX – Risk Arbitrage 1 Fund	£5,166,000 principal amount of 8.875 Notes £427,000 principal amount of 8.375 Notes
2. HFR MA Strategic Master Trust	£1,904,000 principal amount of 8.875 Notes £157,000 principal amount of 8.375 Notes
3. Institutional Benchmark Series (Master Feeder) Ltd.	£2,825,000 principal amount of 8.875 Notes £233,000 principal amount of 8.375 Notes

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|---|---|
| 4. Lyxor/Paulson International Fund Limited | £5,052,000 principal amount of 8.875 Notes
£417,000 principal amount of 8.375 Notes |
| 5. Paulson Enhanced Ltd. | £89,774,000 principal amount of 8.875 Notes
£7,414,000 principal amount of 8.375 Notes |
| 6. Paulson International Ltd. | £27,521,000 principal amount of 8.875 Notes
£2,273,000 principal amount of 8.375 Notes |
| 7. Paulson Partners Enhanced, L.P | £15,989,000 principal amount of 8.875 Notes
£1,320,000 principal amount of 8.375 Notes |
| 8. Paulson Partners L.P. | £8,037,000 principal amount of 8.875 Notes
£664,000 principal amount of 8.375 Notes |

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telex, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that the Paulson Noteholders do not intend that this Notice of Appearance and Demand for Notices and Service of Papers, or any later appearance or pleading, be deemed or construed to be a waiver of the Paulson Noteholders' rights: (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) to trial by jury in any proceeding so triable in the Cases, or any case, controversy, or proceeding related to the Cases; (iii) to have the District Court withdraw the reference of the Cases from this Court in any matter subject to mandatory or discretionary withdrawal; (iv) to require that notice be served upon any other person, firm or governmental agency; and (v) to any other rights, claims, actions or defenses to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, or defenses the Paulson Noteholders expressly reserve.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Demand for Notices and Service of Papers shall not be construed as an appointment of Steven J. Reisman, Theresa A. Foudy, or Curtis, Mallet-Prevost, Colt & Mosle LLP as authorized agents of the Paulson Noteholders, either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Federal Rules of Bankruptcy Procedure or Rule 4 of the Federal Rules of Civil Procedure.

Dated: July 5, 2012
New York, New York

**CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP**

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Institutional Benchmarks Series (Master Feeder)
Ltd., Lyxor/Paulson International Fund Limited,
Paulson Enhanced Ltd., Paulson International
Ltd., Paulson Partners Enhanced, L.P., and
Paulson Partners L.P.*

To: See Service List attached hereto.

SERVICE LIST

Citigroup Global Markets Inc c/o Citibank, N.A. Ops III, 1615 Brett Rd. New Castle	Knighthood Master Fund, L.P. c/o Knighthood Capital Management 623 Fifth Avenue, 29 th Fl New York, NY 10033
CQS (UK) LLP 33 Grosvenor Place, 5 th Floor London SW1X 7HY United Kingdom	Morgan Stanley & Co. International plc Attn: Brian Cripps 25 Cabot Square, Canary Wharf London E144Qa
SG Aurora Master Fund L.P. 825 Third Ave, 34 th Fl. New York, NY 10022	THE CANYON VALUE REALIZATION FUND (CAYMAN), LTD Loan San 9665 Wilshire Blvd., Suite 200 Beverly Hills, CA 90212
Anchorage Capital Master Offshore Ltd Attn: Dan Allen c/o Anchorage Advisors, LLC 610 Broadway, 6 th Fl. New York, NY 10012	Fried, Frank, Harris Shriver & Jacobson LLP Attn: Gary Kaplan, Esq. One New York Plaza New York, NY 10004
Onex Debt Opportunity Fund Ltd c/o Onex Credit Partners, LLC 910 Sylvan Avenue, Suite 100 Englewood Cliffs, NJ 07632	Redwood Capital Management LLC Attn: Jonathan Kolatch 910 Sylvan Avenue Englewood Cliffs, NJ 07632
Collins Stewart Ltd PO Box 328 St. Peter Port, Guernsey GY1 3TY	Compagnie Financiere de Gestion Luxembourg S.A. 40, boulevard Joseph II L-1840 Luxembourg

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